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Subject: Re: Fw: WQ Workshop: Corps comments. (UNCLASSIFIED)
Attachments: pic09347.gif pic31934.gif Ross workshop summary Corps comments 15Dec06.doc

I quickly read through the Corps' comments. I'm okay with most of them, but I don't recall saying, relative to the Columbia River TMDL, that we need to have a 'totally new ... modeling team.' I do think that an important early step is to get the modeling experts together and see if we can agree on an approach to modeling the River.

I am willing to bet that people are making more out of the modeling 'issue' than it really warrants. I fully agree with the Corps that there needs to be agreement on the important assumptions and boundary conditions; but after that, modeling is just a matter of how much complexity you want to try to simulate. Our model is fairly simple, in terms of what it predicts -- an average temperature for the river's cross-section at any period in time. One can produce models that give more geometrically specific predictions, in terms of depth or in terms of distance from the shoreline. Those are some of the models that others have promoted. But the more complex models require data that could take quite some time -- maybe years -- and would not necessarily produce a compliance or regulatory outcome with any greater value than our readily available and easy-to-run model.

If you come up with a more complex model that shows the river is 16 degrees at the bottom in the middle of the channel, and 18 degrees near the eastern shore, what does that mean in terms of TMDLs and permits and implementation plans, vis a vis dams? We are still going to find that Grand Coulee raises the temperature of the river, relative to its natural condition, at certain time of the year. So do the Corps dams on the Snake River. The issue isn't the model, it is the assumptions. A more complex model might describe the challenge at certain dams slightly differently, but it likely won't conclude that there is no temperature-related challenge at all. I guess another way to think about this is that the challenge might be X days, or X + 2 days, or X - 3 days, or whatever, but is isn't likely to be 0 days; so unless it is a very marginal situation at a specific dam, we'd be better off focusing our attention on the various fixes, determining what is really feasible and practical, and moving forward with the appropriate regulatory path.

We also need to keep in mind that the assumptions underlying the TMDL calculation business are to a large degree determined by the State's standards. Just like in Oregon and the Willamette TMDL, I don't believe we have great freedom to adjust the assumptions to, for example, consider the dams to be in the 'baseline.' When we have our conversation about assumptions and boundary conditions, we will either need to involve our state partners or make sure we understand their views. Otherwise we will produce a TMDL that they cannot accept.

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MaryLou Soscia/R10/USEPA/US
12/15/2006 02:14 PM

To jerry.boese@ross-assoc.com, sarah.calvillo@ross-assoc.com
cc Jannine Jennings/R10/USEPA/US@EPA, Mike Gearheard/R10/USEPA/US
Subject Fw: WQ Workshop: Corps comments. (UNCLASSIFIED)

Jerry and Sarah:

I would like to review these comments with you - I will call you when I get back from VA.....

Mary Lou

----- Forwarded by MaryLou Soscia/R10/USEPA/US on 12/15/2006 02:13 PM -----

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12/15/2006 11:26 AM

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cc
Subject

WQ Workshop: Corps comments. (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

As requested: Corps of Engineers comments on the Water Quality Workshop summary by Ross & Associates are attached.

Contact Dave Shepp (202-761-7698) or myself if you have questions about the comments.

Thank you for the opportunity to comment on the summary.

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Classification: UNCLASSIFIED
Caveats: NONE

(See attached file: Ross workshop summary Corps comments 15Dec06.doc)